

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

FILED
U.S. BANKRUPTCY COURT
2024 JAN -4 P 1:01

In re:

RAHUL DEV MANCHANDA,

Debtor

Chapter 7 **S.D. OF N.Y.**

Case No. 23-22095 (SHL)

DEBTOR REPLY AFFIRMATION TO KAREN SAGER GOLDBERG

TO: THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

The Debtor, Rahul Dev Manchanda, submits this Reply Affirmation to Karen Sager Goldberg as follows:

1. We have been advising Karen for almost 1 year that there is a bankruptcy stay in place and that we have placed a retaining lien on the file placing it with a collection agency, then over to the trustee, but she ignores it and continues to litigate, threaten, harass, intimidate us using her contacts in the courts.
2. In her Reply Affirmation, she falsely states that the client file has no value, but this is untrue - the former client owes a balance of approximately \$6500 and we placed it with collections, and then with the trustee.
3. In her Reply Affirmation, she again lies because up until October 2023 I had employees/attorneys/staff dealing with her and any and all other clients with

the strict instructions that we had filed for chapter 7 bankruptcy, with my last employees leaving in late October 2023 when I could no longer pay them anymore.

4. Karen lies - we have been notifying her repeatedly since at least February 2023 (see attached exhibits) about our chapter 7 bankruptcy filing.
5. Additionally the first email I ever received from her was late October early November 2023 because our email was only cc'ed matrimonial court e-file automatic case dispatches as "former lawyers," which of course we could not either open, or read (see exhibits).
6. But she still harassed us incessantly almost every day, even sending someone to our office when I was not there.
7. Not only that, even after being notified she kept going to court and asking her judge friends to order the file and other harassment, threats, intimidation.
8. Even as late as 11/15/23 Karen Sager Goldberg filed an Order to Show Cause seeking to challenge the federal bankruptcy order (see attached exhibits).
9. This is even after we told her that we even filed a NEW chapter 7 for the law firm in case 23-11805.

10. They even scheduled me for a court appearance on 12/11/23, 12/13/23, as well as on 01/11/24 this year (see attached exhibits).
11. I never received any order as she admits she never served me until I got it in the mail on 12/27/2023 and the same day I filed this Notice of Motion for Contempt of Court.
12. We already told her 100s of times that we filed two chapter 7 bankruptcies since February 2023 and then again on November 2023 but she threatened, litigated, harassed anyway, I even have a court date with her on 01/11/24!

Dated: 01/03/2023

Respectfully submitted,

RAHUL DEV MANCHANDA
Pro Se Debtor



270 Victory Boulevard
New Rochelle, NY 10804
Telephone: (212) 968-8600
Email: rdm@manchanda-law.com

CERTIFICATE OF SERVICE

On January 3, 2024, I, Rahul Manchanda, served a copy of this DEBTOR REPLY AFFIRMATION TO KAREN SAGER GOLDBERG and any attached pages to 1628 Kings Highway at East 17th Street, Brooklyn, New York 11229 via Electronic and U.S. Mail.



By: Rahul Manchanda, Esq.
Manchanda Law Office PLLC
270 Victory Boulevard
New Rochelle, New York 10804
Tel: (212) 968-8600
Fax: (212) 968-8601